

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

United States of America,	:	
Plaintiff,	:	Case No. 2:20-cr-94(3)
	:	
vs.	:	Judge Sarah D. Morrison
	:	
	:	
Eric Ahiekpor,	:	
Defendant.	:	

**DEFENDANT ERIC AHIEKPOR'S MOTION FOR RECONSIDERATION  
TO TRAVEL**

Now comes Defendant Eric Ahiekpor, by and through counsel and moves this Court for reconsideration and an order to allow him to travel to Miami, FL on April 18, 2022, and return on April 27, 2022, to accompany his wife for a surgical procedure. (See Attached Exhibit A, B, and C)

Respectfully submitted,

/s/ Byron L. Potts

Byron L. Potts (0040246)  
Attorney for Defendant  
761 South High Street  
Columbus, Ohio 43206  
614/228-2154  
byronpotts@msn.com

**CERTIFICATE OF SERVICE**

I hereby certify that on April 14, 2022, a copy of the foregoing was filed electronically. Notice of this filing will be sent to Plaintiff by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

A copy of the foregoing was also sent via email to the following this 14th day of April 2022:

Melinda Vincent  
U.S. Probation Officer  
melinda\_vincent@ohsp.uscourts.gov

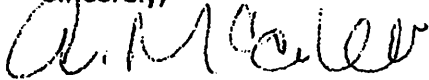
Peter Glenn-Applegate  
Assistant United States Attorney  
peter.glenn-applegate@usdoj.gov

/s/Byron L. Potts  
Byron L. Potts (0040246)  
Attorney for Defendant

The surgery is April 21 and per the doctor rules I must be accompanied by someone 21 years or older. In my documents I let the doctor know my husband Eric will be accompanying me during pre and post op. I would not be able to walk or do anything physical for 5 days. I have no one else that can be there for me during that time. I am going under anesthesia and need my husband who is also certified as a care provider through his home health business to be there in case anything wrong were to go wrong

I have tried finding someone else to accompany to no success. I respectfully request the court to reconsider his request to travel with me. He is not only my husband but also my support system in everything I do. I can be reached at the number below should you have any questions. Thank you.

Sincerely,



Akenya McCaleb  
6142608194



Dear Judge Sarah Morrison,

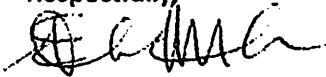
I have attached this letter and a letter from my wife Akenya McCaleb respectfully requesting reconsideration on my request to accompany my wife to Miami for her surgery. I understand this a cosmetic surgery and therefore it is not deemed as essential. However, her payment is not refundable. And she has also done her required primary physician visits and blood work.

Per the doctors' instructions my wife needs someone to accompany her to her pre and post operation. She is not able to do anything while recovering and needs help activities of daily living.

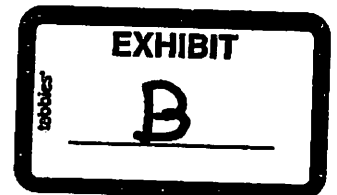
My wife doesn't have anyone to help her besides me. None of family members can request time off work to accompany her.

Your Honor, as you well know, I have traveled to St. Louis, DC, NY, New Jersey and Miami and back without any incident. This will be much like the same. If there are additional information that need to be presented, kindly let me know. Thank you for your time.

Respectfully,



Eric Ahiekpor.





## *Certificate of Successful Completion*

*This is to verify that*

**ERIC AHIEKPOR**

*successfully completed an approved  
Nurse Aide Training and Competency Evaluation Program*

**On this 16th Day of August, 2010**

*presented by*

**PREMIER CHOICE HEALTH SERVICES  
3651880**

*In accordance with rule 3701-18-24 Ohio Administrative Code, presentation of this Certificate is required in order for the individual to participate in the written examination and performance demonstration components of the Competency Evaluation Program (CEP) conducted by the Director of Health. Both components of the CEP must be successfully completed within twenty-four months from the date on this certificate.*

*Signature of Program Coordinator*

Validation Code: August 16, 2010 22:25

